

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Roanoke Division

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PIO MENDOZA and AMADO MENDEZ,  
on behalf of themselves  
and all others similarly situated, et al.

Plaintiffs,

v.

BAIRD DRYWALL & ACOUSTIC, INC., et al.,  
Defendants.

CASE NOS. 7:19-CV-882 and  
7:21-CV-00365

and

JOSEPH BRITT, individually

Plaintiff,

v.

BAIRD DRYWALL & ACOUSTIC, INC.,  
Defendant.

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**JOINT MOTION TO APPROVE SETTLEMENT**

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Pio Mendoza and Amado Mendez, on behalf of themselves and all others similarly situated, and Joseph Britt on behalf of himself (“Plaintiffs”) and Baird Drywall & Acoustic, Inc. (“Baird”), Ramiro Torres Martinez, d/b/a Torres Drywall (“Torres”), and Guillermo Guardado Fiallos, d/b/a GGF Drywall, LLC (“GGF”) (collectively, “Defendants”) (“Defendant”), by their respective counsel, respectfully move the Court to enter an Order approving the settlement of this FLSA action. A copy of the proposed settlement is attached as Exhibit 1 and a copy of a proposed Joint Consent Order is attached as Exhibit 2. For the Court’s consideration, the parties are submitting a joint memorandum in support of this Motion.

For the reasons set out in the memorandum, the parties believe the settlement is fair and reasonable. Wherefore, the parties request that the Court approve the settlement and enter the Proposed Consent Order provided as an attachment to this Joint Motion to Approve Settlement.

Respectfully submitted,

<p><b>PIO MENDOZA, ET AL., and JOSEPH BRITT</b></p> <p><u>/s/Craig Juraj Curwood</u> Craig Juraj Curwood (VSB No. 43975) Zev Antell, Esq. (VSB No. 74634) Butler Curwood, PLC 140 Virginia Street, Ste. 302 Richmond, Virginia 23219 Tel: 804-648-4848 Fax: 804-237-0413 craig@butlercurwood.com zev@butlercurwood.com</p> <p><u>/s/Timothy Coffield</u> Timothy Coffield (VSB No. 83430) COFFIELD PLC 106-F Melbourne Park Circle Charlottesville, VA 22901 P: (434) 218-3133 F: (434) 321-1636 tc@coffieldlaw.com</p> <p><i>Counsel for Plaintiffs</i></p>	<p><b>BAIRD DRYWALL AND ACOUSTIC, INC.</b></p> <p><u>/S/Andrew S. Gerrish</u> Andrew S. Gerrish, Esq. Nathan H. Schnetzler, Esq. Glenn B. Williams, Esq. FRITH ANDERSON + PEAKE P.O. Box 1240 Roanoke, Virginia 24006-1240 Phone: (540) 772-4600 Fax: (540) 772-9167 agerrish@faplawfirm.com nschnetzler@faplawfirm.com</p> <p><i>Counsel for Defendant Baird Drywall and Acoustic, Inc.</i></p>
<p><b>RAMIRO TORRES MARTINEZ, D/B/A TORRES DRYWALL</b></p> <p><u>/s/Aaron B. Houchens</u> Aaron B. Houchens Aaron B. Houchens, P.C.</p>	<p><b>GUILLERMO GUARDADO FIALLOS, D/B/A GGF DRYWALL</b></p> <p><u>/s/Catherine J. Huff</u> Catherine J. Huff (VSB No. 78610) GENTRY LOCKE</p>

<p>111 East Main Street Salem, VA 24153 Phone: (540) 389-4498 Email: aaron@houchenslaw.com Counsel for Ramiro Torres Martinez d/b/a Torres Drywall</p> <p>Christopher K. Kowalczyk Attorney at Law P.O. Box 11971 Roanoke, VA 24022-1971 Phone: (540) 345-0101 Fax: (540) 342-0004 Email: fedecf@ckklaw.net Counsel for Ramiro Torres Martinez d/b/a Torres Drywall</p> <p><i>Counsel for Ramiro Torres Martinez D/B/A Torres Drywall</i></p>	<p>10 Franklin Road S.E., Suite 900 P.O. Box 40013 Roanoke, Virginia 24022-0013 (540) 983-9300 FAX: (540) 983-9400 huff@gentrylocke.com</p> <p><i>Counsel for Guillermo Guardado Fiallos D/B/A GGF Drywall</i></p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record:

/s/Timothy Coffield  
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